

FILED
5/29/2025 2:17 PM
Mariyana T. Spyropoulos
CIRCUIT CLERK
COOK COUNTY, IL
2019L005521
Calendar, 8
32913622

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, CHANCERY DIVISION**

ROBERT GOLDBERG, DDS,	)	
	)	
Plaintiff,	)	Case No. 2019 L 005521
v.	)	
	)	(Transferred to Chancery)
MARY KATHERINE ALBERTI,	)	
	)	Honorable Michael T. Mullen
Defendant.	)	

**DEFENDANT’S FIRST AMENDED MOTION
FOR CLARIFICATION AND TO PRESERVE RIGHTS**

Defendant, Mary K. Alberti (“Defendant”), pro se, respectfully requests that the Court provide written clarification regarding the procedural status and legal effect of its November 22, 2024, order, particularly with respect to its finality and appealability. Defendant also seeks to preserve her rights. In support of this request, Defendant states as follows:

INTRODUCTION

Defendant respectfully seeks guidance and clarification regarding that Court’s November 22, 2024 dismissal order, which was not labeled final or appealable, did not resolve any claim on the merits, preserved Plaintiff’s right to refile, and left key statutory, constitutional, and other legal rights unresolved – including Defendant’s ability to assert anti-SLAPP protections under the Illinois Citizen Participation Act.

Since dismissal, Defendant has submitted multiple filings in efforts to address the outstanding matters that remain unresolved, but she cannot proceed without understanding the Court’s interpretation of its order. It remains unclear: (i.) Whether dismissal without prejudice constitutes a final, appealable order. If so, Defendant was not given fair notice of this procedural consequence.; and (ii.) The contradiction between the Court’s oral ruling and the written dismissal

order, particularly the inclusion of Rule 219(e). This discrepancy has caused significant procedural confusion, raising concerns as to whether Defendant unknowingly waived rights through procedural manipulation. Defendant cannot waive rights she did not know were being waived – especially procedural rights tied to statutory protections.

Proceeding pro se, Defendant is simply seeking to protect herself but faces uncertainty regarding the legal implications of the Court’s ruling, particularly given the lack of transparency surrounding the order’s formation.

Conflicting interpretations by counsel for both parties has only deepened the confusion, creating hardship for Defendant, who has endured six years of prolonged litigation targeting her protected speech. Plaintiff appears to have leveraged procedural ambiguity – including the inclusion of Rule 219(e) despite the Court’s oral rejection – to ensure that Defendant forfeited defenses she would have asserted had she been properly informed.

Defendant does not seek to relitigate this case or the November 22 order. Rather, this motion **solely seeks clarification** of the issues outlined in the “**Request for Relief**” section.

Due to genuine procedural confusion, it now appears that Defendant’s statutory, constitutional, and other legal rights may have been unknowingly foreclosed. Defendant did not realize this at the time and seeks clarification because Plaintiff’s current position suggests this may be the case.

If the Court confirms that these rights were foreclosed, it raises concerns given the lack of transparency surrounding the order’s formation and its impact on Defendant’s ability to protect herself from further litigation abuse or seek redress.

The following background provides necessary context – not to advocate for any particular interpretation, but to demonstrate how Defendant reasonably formed her understanding of the

dismissal's implications and why clarification is warranted. Without a clear understanding of how the Court has applied the order, Defendant cannot take the necessary steps to safeguard her rights.

BACKGROUND AND PROCEDURAL CONTEXT

A. Six Years of Legal Harassment

Since May 2019, Plaintiff has weaponized litigation to suppress speech, seeking \$4,000,000 in damages for alleged defamation. His affidavit – claiming damages “in excess of \$50,000” – came shortly after his conversation with an Illinois state senator, following Defendant’s request for assistance on matters of public concern involving Plaintiff and advocacy for reform resulting from it. Legislation addressing those concerns has since been introduced.

Concurrently, Plaintiff repeatedly flagged, parked, and sought removal of a truthful consumer review referencing an incorrect dental scan. After exhausting other remedies, Defendant was advised by her congresswoman’s office to seek assistance from the Illinois Department of Financial and Professional Regulation. Despite no efforts made by Plaintiff to resolve issues, he labeled all of Defendant’s efforts defamatory.

From 2019 to 2020, Plaintiff obtained expedited, one-sided discovery, while Defendant was systematically denied reciprocal access – even though Defendant experienced similar circumstances to those cited by Plaintiff’s counsel as justification for the expedited discovery. Over five years, Plaintiff deliberately delayed proceedings, evaded discovery obligations, and engaged in coercive tactics – including inflammatory claims of “criminal witness tampering” and kidnapping threats involving opposing counsel’s daughter – to force Defendant into settlement.

When party discovery finally commenced, Defendant produced thousands of pages of evidence, yet Plaintiff, despite having over a year to respond, provided nothing substantive – only materials Defendant had already received through prior one-sided discovery. Defendant had to

request the 2019-2020 responsive documents again in 2023-2024 party discovery because, despite being under a court order, Plaintiff did not produce them in 2020. When denied an extension to answer Defendant's Requests to Admit, which would be deemed admitted if unanswered, Plaintiff voluntarily dismissed his claim. Yet, in a contradictory maneuver, he simultaneously sought additional time to respond to the same Requests, reinforcing the inference that dismissal was intended to avoid proving his claims.

Plaintiff failed to identify a single defamatory statement in context, whether *per se* or *per quod*. Despite six years of litigation, he produced no evidence of emotional distress, reputational harm, or business loss – nor has he substantiated claims of medical and psychological conditions, including alleged “restless leg syndrome.” Plaintiff also holds extensive documentation submitted by Defendant that directly contradicts his allegations, yet he has refused to acknowledge or provide countervailing evidence.

Throughout this litigation, Plaintiff both misrepresented material facts and distorted context – most notable, manufacturing claims of “cyber harassment” and “impersonation” despite direct contradictions. His selective framing of events and omission of key facts transformed routine consumer speech into a manufactured legal dispute, bypassing fundamental statutory protections.

Though Plaintiff voluntarily dismissed this case, the threat of refiling remains a tool to suppress Defendant's future speech, perpetuating a chilling effect. His misrepresentations and distortions during earlier proceedings obstructed Defendant from asserting anti-SLAPP protections under Illinois law in 2020, an issue that remains unresolved – leaving Defendant vulnerable to continued legal harassment and procedural uncertainty. Without judicial clarification, this ambiguity allows litigation threats to persist indefinitely, evading substantive adjudication while undermining established speech protections.

This threat is far from hypothetical. Defendant has already endured six years of financial and emotional strain under baseless claims Plaintiff never intended to prove in the first place, instead weaponizing litigation as a suppression and settlement extraction tactic. While the Court's order conditions refiling on payment of nominal costs under Rule 219(e), it imposes no good faith requirement or mandate to prove damages, leaving Defendant's constitutional, statutory, and due process rights unresolved. The existing framework not only enables Plaintiff to continue exploiting litigation against Defendant but also against others – simply because the system allows it.

Additionally, Defendant remains gravely concerned about the safety and potential misuse of her personal information in Plaintiff's hands. An unfortunate, colossal miscommunication resulting in an unresolved "hack back" incident – central to Plaintiff's allegations – continues to pose ongoing security risks. Despite repeated requests, and recently, Defendant has received no assurance that her information remains protected or responsive materials she never received have been preserved – particularly by Plaintiff's business entities, legal counsel, and associated parties. This lack of accountability deepens procedural limbo and prolongs exposure to future harm.

This case transcends a dispute between private parties. It illustrates how a healthcare provider can weaponize intimidation to silence patient concerns, reinforcing a systemic power imbalance, including patriarchal dynamics. Used as a retaliatory and punitive tool, legal intimidation chills protected speech and deepens structural inequities.

Defendant does not seek to relitigate past events but requests the Court's guidance to prevent ongoing harm and uphold procedural integrity – ensuring individuals can access support, speak out without fear of retaliation, or seek redress.

B. November 22 Dismissal

On November 22, 2024, the Court granted Plaintiff's voluntary dismissal without

prejudice, conditioning any refiling upon the payment of costs pursuant to 735 ILCS §5/2-1009.

The hearing transcript includes the following statements made by the Court:

- “There's no evidence before me nor that I can recall that the present motion is brought to avoid his discovery obligations, and there's no evidence that at any time Dr. Goldberg failed to comply with any discovery deadlines.” (Official Court Transcript, Nov. 22, 2024, p. 7, Lines 18-22)
- “As such, any expenses consistent with the idea and the spirit and intent of 219(e) are inappropriate.” (p. 7, Lines 23-24)
- “...but it is a statutory right, one that I believe is being exercised without any malice or any motive to frustrate the defendant.” (p. 8, Lines 5-7)
- “The motion seeking to voluntarily dismiss this matter without prejudice is granted. Any costs that have been incurred by the defendant will be payable upon any re-filing of this matter.” (p. 8, Lines 8-11)

Despite these statements, Plaintiff did obstruct discovery, delay party discovery for an extraordinary five years, and ultimately abandoned a \$4 million claim when required to prove it. Far from resolving the matter, this dismissal left open the possibility of further litigation – contingent upon Defendant’s future speech **even though Plaintiff was unwilling to substantiate his claim.**

Plaintiff explicitly affirmed this position in subsequent filings stating:

- “Plaintiff wanted to maintain the right to refile the case if the negative posting about his dental practice resumed.” (*Reply in Support of His Motion for an Extension to Respond to Defendant’s Request to Admit*, Nov. 6, 2024, p. 2, ¶2)
- “Plaintiff and his counsel also aver that they have no intention of refiling the suit unless the Defendant posts objectionable matter about the Plaintiff on the internet.” (*Plaintiff’s Response*, April 18, 2025, Page 2, ¶7).

These statements confirm that the dismissal was not a resolution of a case but a temporary measure contingent on Defendant’s future speech. The implications are clear and chilling: remain silent or risk facing another multimillion-dollar lawsuit. This is not merely a dismissal – it is litigation wielded as coercion, suppressing speech through ongoing legal intimidation.

Defendant has come to understand that this lawsuit is a textbook SLAPP – not intended for legitimate redress, but to silence and punish protected expression. Although Plaintiff dismissed the case when confronted with evidentiary challenges, **the underlying threat remains active.**

Defendant was previously denied the opportunity to file a statutory anti-SLAPP motion when her former counsel announced such an intent in February 2020 due to Plaintiff's misrepresentations. That statutory right remains unresolved, and the November 22 order has introduced additional procedural uncertainty. Specifically:

- It was not labeled final or appealable.
- It did not resolve claims on the merits.
- It preserved Plaintiff's right to refile.
- It left constitutional and statutory defenses unresolved.
- Discovery issues remain outstanding.
- Raises broader concerns regarding litigation abuse in suppressing consumer speech and public participation.

Plaintiff's dismissal without prejudice, explicitly conditioned on refiling should Defendant resume protected speech, demonstrates the calculated use of litigation as a means of suppression. Allowing dismissal without prejudice to serve as an indefinite threat against future speech contradicts both Illinois' anti-SLAPP statute and the Consumer Review Fairness Act.

Failing to adjudicate these unresolved statutory and constitutional defenses would effectively endorse a violation of public policy. Businesses should not be permitted to bypass consumer speech protections through procedural maneuvering rather than direct contractual restrictions. Litigation was allowed to accomplish what federal law expressly prohibits through contracts.

C. The November 22 Order Was Drafted Outside the Record and Introduced Confusion

The written order, prepared by Plaintiff's counsel, includes:

“If the Plaintiff refiles this suit within the prescribed time period, the Defendant shall be entitled to costs and expenses pursuant to 735 ILCS 5/2-1009 and Illinois Supreme Court Rule 219(e).”

However, the Court’s oral ruling directly contradicted this, stating:

“As such, any expenses consistent with the idea and the spirit and intent of 219(e) are inappropriate.”

This fundamental inconsistency has led to significant procedural confusion. Defendant’s former counsel asserted that Plaintiff’s counsel unilaterally inserted 219(e) to deter his own client from refileing, while Plaintiff’s counsel claimed he merely followed judicial direction – yet the record does not support Plaintiff’s assertion, and Defendant’s counsel refutes it.

Additionally, the timeline and sequence of events raise concerns:

- **11:00 a.m.** – Defendant attended the dismissal hearing.
- The Court rejected the application of Rule 219(e).
- **1:19 p.m.** – Plaintiff’s counsel emailed the order’s first draft to Defendant’s counsel.
- Plaintiff’s initial draft omitted 2-1009 costs entirely and referenced only Rule 219 – not 219(e).
- Defendant’s former counsel revised the language to align with the Court’s directive regarding costs under 2-1009 and retained 219(e) without discussing its implications, later conveying to Defendant that its inclusions carried no procedural implications.
- The Court signed an order that directly contradicted its own oral findings.

To date, Defendant finds the unexpected inclusion of **Rule 219(e)** perplexing, given its direct contradiction with the Court’s own oral statements. Defendant’s former counsel reiterated it was inserted at Plaintiff’s prompting, which it was, and confirmed that it was not a stipulation, agreement, or settlement.

While Defendant does not object to its reference in the order, this procedural inconsistency

does not address the broader statutory, constitutional, or discovery issues that remain unresolved.

SIGNIFICANT CONFUSION OVER THE DISMISSAL'S FINALITY

At the time of dismissal, Defendant reasonably believed that her right to raise outstanding statutory and constitutional issues would commence only once the case reached true finality – either through adjudication upon refiling or after the expiration of the one-year refiling window (i.e., November 22, 2025). Defendant understood the order to function as interlocutory in nature, believing that any refiling would operate as an extension of the existing case – rather than as a completely new claim – allowing continued procedural protections.

There was no need to seek reconsideration of Plaintiff's evasive discovery tactics within the 30-day window following November 22, 2024, as his counsel had already inserted Rule 219 expenses related to it into the order. At the time, Defendant believed the dismissal had no immediate finality and saw no basis to challenge outstanding matters since there was no finality.

However, Plaintiff's subsequent positioning of finality – despite the procedural contradictions in the court record – now appears strategic, intentionally muddying the landscape to create procedural confusion for Defendant, which has worked.

Defendant never agreed, nor did her former counsel, to a dismissal framework that allowed refiling while simultaneously foreclosing her statutory defenses. If the dismissal was meant to be final, the absence of explicit notice regarding Defendant's limited timeframe to assert unresolved rights has caused genuine procedural uncertainty, warranting clarification.

RECONSIDERATION IS NECESSARY DUE TO LITIGATION ABUSE

Given all the ambiguity and contradictions, Defendant became increasingly troubled within a week after dismissal. Why would Plaintiff's counsel willingly impose costs and expenses under Rule 219 upon his own client, especially given his six-year history of legal harassment on his

behalf? Plaintiff has circumvented anti-SLAPP protections by filing multiple amended complaints (3rd, 4th, and 5th versions). If he refiles another amended complaint, without resolving outstanding statutory and constitutional defenses, Defendant remains vulnerable to continued abuse.

Rather than waiting until the order's expiration in November 2025, Defendant acted preemptively to avoid prejudice. On December 2, 2024, Defendant signaled her intent to seek reconsideration – not of the dismissal itself, but of broader unresolved statutory and constitutional matters that must be addressed to prevent litigation abuse again.

Plaintiff's counsel now asserts the dismissal is final and jurisdiction-stripping, having the same effect as a dismissal with prejudice – yet Defendant does not understand how, given the lack of adjudication on constitutional and statutory issues. Additionally, Plaintiff's counsel recently reframed the situation, claiming that Defendant had a binary choice:

- Accept dismissal with costs and expenses under 2-1009 and Rule 219; or
- Pursue dismissal with prejudice and another potential remedy.

However, Defendant never agreed to this framing. Her former counsel confirms he did not either. Defendant would not have traded statutory rights for nominal costs.

If, as Plaintiff now claims that the addition of Rule 219(e) costs signaled finality, this interpretation was never conveyed to Defendant, nor reflected in the Court's oral findings.

CONFLICTING INTERPRETATIONS REQUIRE JUDICIAL CLARIFICATION

Defendant reasonably interprets that her rights remain intact until Plaintiff triggers refiling or she addresses them upon finality in November 2025. Plaintiff's position, however, suggests that the inclusion of Rule 219(e) signaled finality, yet this was never conveyed to Defendant nor reflected in the Court's oral findings.

Defendant did not fail to seek reconsideration within the 30-day period due to waiver, she

simply was not aware that the dismissal could operate as final closure. She acted preemptively while transitioning to self-representation, unaware that her rights may have been foreclosed.

Plaintiff's inclusion of Rule 219(e) may not have been a good-faith deterrent to refile, but rather a strategic foreclosure of Defendant's statutory and constitutional rights – while preserving Plaintiff's litigation flexibility. The only individual who benefited from it was Plaintiff. If finality was assumed through his prompting of trivial expenses under Rule 219(e), this directly conflicts with the Court's stated position at the hearing.

While Defendant recognizes that attorneys may agree upon certain elements in orders, this *major contradiction* with the oral record requires judicial clarification given its significant effect. Defendant maintains that her rights remain open and adjudicated but requires confirmation from the Court as to its interpretation of its own order. The dismissal order – in its formation and intent – remains fundamentally flawed.

FINALITY IN FORM, BUT NOT SUBSTANCE

Although the Court dismissed the case without prejudice, it lacks substantive finality as it did not resolve claims on the merits, permitted refile, left open the potential for renewed litigation based on Defendant's future speech, and failed to address whether her statutory and constitutional protections remain intact. Regardless of how this omission occurred, Defendant's statutory and constitutional rights remain adjudicated unless the Court expressly rules otherwise.

Significant issues related to discovery, due process, and protection of personal data also remain unaddressed. Plaintiff's stated intent "not to refile unless Defendant speaks again" does not constitute a commitment to end litigation – it preserves a procedural tool for indefinite speech suppression while avoiding judicial scrutiny.

Illinois law recognizes that procedural finality does not override outstanding substantive

rights. A truly final order must resolve all claims and rights of all parties. Here, it did not. Defendant's anti-SLAPP protections, including the motion her former counsel intended to file in 2020, remain unsuspended and unheard.

At minimum, the Court retains jurisdiction to clarify or modify its prior order to reflect the case's actual posture, particularly where ambiguity, procedural harm, or ongoing prejudice exist.

Even if the Court deems the dismissal procedurally final, unresolved issues persist, and jurisdiction remains over matters such as sanctions, statutory and constitutional claims, and due process concerns – even post-dismissal. True finality cannot be presumed where unaddressed rights persist. The critical question remains: Can the Court's jurisdiction over unresolved constitutional and statutory rights be extinguished solely through language introduced outside the record, absent formal judicial findings?

PREVENT ONGOING HARM AND PRESERVE PUBLIC POLICY

The ambiguity of the November 22, 2024, order has placed Defendant and the broader public interest in legal limbo, allowing unchecked procedural tactics that suppress speech while evading formal adjudication.

Although the order formally allows Plaintiff to refile, Plaintiff's counsel has made clear that this power remains conditional – litigation will resume if Defendant engages in further protected speech. This weaponizes procedural uncertainty, not as a resolution, but as a lingering threat designed to silence speech through intimidation rather than legal merit.

Since the Court did not rule on whether this case constitutes a SLAPP, Defendant's statutory rights under Illinois' anti-SLAPP law remain unadjudicated. Additionally, while the Consumer Review Fairness Act does not provide a private remedy, its public policy protections remain unaddressed. As a result, this record risks being erased without substantive review,

bypassing the very safeguards meant to prevent retaliatory litigation against speech in the public interest.

If the Court intended to treat this dismissal as final, then the absence of clarity – both in the record and transcript – creates a dangerous precedent, insulating future litigants from accountability when dismissal is used as a tactical pause rather than a legitimate termination of claims.

This ambiguity does not only harm Defendant, but it weakens statutory safeguards meant to protect public discourse and consumer speech. Individuals who reach for help, provide truthful reviews, or speak on matters of public concern remain vulnerable when litigation tactics allow threats to remain dormant rather than resolved.

Defendant does not seek reconsideration of the dismissal itself but respectfully urges the Court to clarify whether procedural ambiguity was leveraged to sidestep adjudication of statutory and constitutional protections, ensuring that dismissal does not become a sanctioned tool for suppressing speech through uncertainty rather than due process.

REQUEST FOR RELIEF

Defendant respectfully requests that the Court provide written clarification regarding the legal effect and implications of its November 22, 2024, order of dismissal. Defendant seeks guidance on the following key issues:

A. Finality and Appealability

- Whether the Court considers the November 22, 2024, order final and appealable, and whether it is intended to function as a dismissal with prejudice rather than interlocutory in nature, despite its “without prejudice” label.

If the Court considers the order final, Defendant respectfully notes she was not given fair notice of that intent or its legal consequences. This clarification is necessary to ensure that no waiver or forfeiture of rights is inferred.

B. Legal and Procedural Basis

- If final, Defendant requests the basis for the Court's interpretation.
- Clarification of the Court's view of the inclusion of Rule 219(e), particularly given its contradiction with the Court's oral findings and its potential procedural implications.

C. Effect on Unresolved Defenses and Claims

Defendant seeks confirmation on whether the dismissal order affects, waives, or bars unresolved issues, including:

- Defendant's statutory rights under the Illinois anti-SLAPP statute (735 ILCS 110/) which she was unable to invoke due to Plaintiff's misrepresentations.
- Defendant's right to seek sanctions or relief for unresolved discovery issues.
- Unadjudicated statutory, constitutional, and due process protections.

Defendant did not knowingly waive any of these rights and requests confirmation that the dismissal does not foreclose them.

D. Effect on Future Litigation

- Whether the dismissal order affects Defendant's ability to preserve, assert, or seek redress for statutory or constitutional rights arising from this action in any future litigation brought by Plaintiff based on the same underlying facts or claims.

If Plaintiff refiles the case, Defendant intends to assert that such refile is a continuation of this litigation and reserves the right to raise all previously unadjudicated defenses and statutory protections – especially anti-SLAPP rights – regardless of any amendments Plaintiff may introduce to circumvent them through amended pleadings – just as he did to avoid these defenses in the 3rd, 4th, and 5th Amended Complaints.

E. Retention of Jurisdiction

Whether the Court retains jurisdiction over the case, particularly in light of:

- Plaintiff's continued right to refile under Illinois law.
- The absence of rulings on key statutory and constitutional issues.

F. Preservation of Rights

Whether the Court considers Defendant's rights preserved under the November 22, 2024, order. Including:

- Anti-SLAPP defenses,
- Discovery-related sanctions, and
- Constitutional protections.

Defendant expressly preserves all unresolved claims, defenses, and rights and requests confirmation that these remain intact despite dismissal.

G. Preservation of Record for Appellate Review

If the Court determines it lacks jurisdiction to consider this motion or any part of it, Defendant respectfully requests:

- That this filing is not treated as informal correspondence from a pro se litigant but is formally preserved for appellate review.
- That the Court formally acknowledges finality, due process, and statutory rights remain open issues subject to appellate consideration.

Defendant expressly does not waive her right to be heard on any unresolved issues should the Court clarify that it lacks jurisdiction to rule on them at this time. Defendant requests the opportunity for full consideration of all relevant matters before any final determination is made.

H. Pro Se Filing Clarification

As a separate matter, Defendant acknowledges the Court's position that "appearing pro se" and "proceeding pro se" are treated as synonymous, and that a formal motion to "proceed pro se" is unnecessary and may be struck if filed.

To avoid procedural uncertainty, Defendant submits filings on her own behalf, presuming they are subject to the Court's review and preservation for appellate purposes.

To the extent that earlier filings may not have explicitly preserved all unresolved rights, claims, or defenses, Defendant does so now ensuring that no statutory or constitutional protections are unintentionally waived.

CONCLUSION

Defendant respectfully seeks the Court's guidance and clarification of the matters outlined in the "**Request for Relief**" section, not to prolong proceedings, but to preserve and protect her rights amid significant ongoing hardship.

Respectfully submitted,

MARY K. ALBERTI

By: /s/ Mary K. Alberti
Defendant, *pro se*

Mary K. Alberti, *pro se*
1454 Ashland Ave.
Des Plaines, IL 60016
(312) 859-1083
maryalbertii@yahoo.com

CERTIFICATE OF SERVICE

I, Mary K. Alberti, pro se, hereby certify that on May 29, 2025, I filed with the Clerk of the Circuit Court, Chancery Division, Chicago, Illinois, using the Odyssey eFileIL system, **DEFENDANT'S FIRST AMENDED MOTION FOR CLARIFICATION AND TO PRESERVE RIGHTS**, a copy which is attached hereto and hereby served upon you.

Terrence Buehler (Of Counsel) (tbuehler@tbuehlerlaw.com)
LUBIN AUSTERMUEHLE DITOMMASO, P.C. (102212)
17W220 22nd Street, Suite 410
Oakbrook Terrace, Illinois 60181
360 West Butterfield Rd. Suite 32
(630) 333-0333

Peter S. Lubin (peter@l-a.law)
LUBIN AUSTERMUEHLE DITOMMASO, P.C. (102212)
17W220 22nd Street, Suite 410
Oakbrook Terrace, Illinois 60181
360 West Butterfield Rd. Suite 32
(630) 333-0333

James K. Borgia (jborgia@tresslerllp.com)
TRESSLER LLP
233 South Wacker Drive, 61st Floor
Chicago, IL 60606
(312) 627-4000
Firm No. 46239

MARY K. ALBERTI

By: /s/ Mary K. Alberti
Defendant, pro se

Mary K. Alberti, *pro se*
1454 Ashland Ave.
Des Plaines, IL 60016
(312) 859-1083
maryalbertii@yahoo.com